

Omid E. Khalifeh, SBN 267340
Ariana Santoro, SBN 300767
Louise Jillian Paris, SBN 347801
OMNI LEGAL GROUP
10880 Wilshire Blvd., Ste. 1860
Los Angeles, California 90024
Phone: 310.276.6664
Facsimile: 310.305.1550
omid@omnilg.com
ariana@omnilg.com
jillian@omnilg.com

Attorneys for Plaintiff
YAGOUBZADEH LAW FIRM LLP


**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

YAGOUBZADEH LAW FIRM LLP, a California Limited Liability Partnership; Plaintiff, vs. ULISES PIZANO-DIAZ, an individual; Defendant.	Case No.: 2:23-cv-08299 STATEMENT OF GENUINE ISSUES OF MATERIAL FACT IN DISPUTE IN SUPPORT OF OPPOSITION TO MOTION FOR SUMMARY JUDGMENT
---	---

Pursuant to Central District Local Rule 56-2, Plaintiff Yagoubzadeh Law Firm LLP files the following Statement of Genuine Issues of Material Fact in Dispute in support of its Opposition to the Motion for Summary Judgment.

	Uncontroverted	Opposing Party's Response to Cited Fact and Supporting Evidence
1		
2	1 Plaintiff is a purveyor of legal	Undisputed.
3	services.	
4		
5	2 On December 20, 2019, Plaintiff	Undisputed.
6	filed a federal trademark application	
7	for the trademark: "1-800-	
8	LUCHADOR for legal services in	
9	international class 045, application	
10	serial no. 88736099.	
11		
12	3 On December 13, 2022, Plaintiff's	Undisputed.
13	federal trademark application for	
14	the trademark "1-800-	
15	LUCHADOR" for legal services in	
16	international class 045 is granted	
17	and assigned registration no.	
18	6920485.	
19		
20	4 Plaintiff was did not file a §2(f)	Undisputed.
21	affidavit of acquired distinctiveness	
22	as part of application serial no.	
23	88736099.	
24		
25	5 The word "LUCHADOR" is a	Undisputed.
26	Spanish word that translates to the	
27	English word "FIGHTER."	
	6 The word "FIGHTER" is highly	Disputed. The word "FIGHTER" is not
	descriptive of "legal services."	highly descriptive of "legal services".
		Declaration of Omid E. Khalifeh, Exh. A-D.

	Uncontroverted	Opposing Party's Response to Cited Fact and Supporting Evidence
7	There are over 50 federal registrations for "legal services."that include the word "FIGHTER" or its base word "FIGHT."	Undisputed.
8	There are multiple purveyors of "legal services" that that use common law trademarks that include the word "FIGHTER" or its base word "FIGHT."	Undisputed.
9	Defendant is a purveyor of legal services.	Undisputed.
10	Defendant is currently using the trademark LUCHADOR LAWYER in conjunction with legal services.	Undisputed.
11	Defendant currently owns a pending federal trademark application for the trademark LUCHADOR LAWYER for legal services in international class 045, application serial no. 98527115.	Undisputed.
12	Defendant is currently using the trademark ABOGADO LUCHADOR in conjunction with legal services.	Undisputed.

	Uncontroverted	Opposing Party's Response to Cited Fact and Supporting Evidence
13	Defendant currently owns a pending federal trademark application for the trademark ABOGADO LUCHADOR in conjunction with legal services in international class 045, application serial no. 98527093.	Undisputed.
14	Defendant is using the trademark:  <p>in conjunction with legal services</p>	Undisputed.
15	Defendant currently owns a pending federal trademark application for the trademark:  <p>in conjunction with legal services in international class 045, application serial no. 98527171.</p>	Undisputed.

1 RESPECTFULLY SUBMITTED this 21st day of November, 2024.

2
3 **OMNI LEGAL GROUP**

4
5 /s/ Omid E. Khalifeh
6 Omid E. Khalifeh
7 Ariana Santoro
8 Louise Jillian Paris
9 Attorneys for Plaintiff,
10 Yagoubzadeh Law LLP
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27